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REMARKS

This responds to the final Office Action of January 26, 2004 ("Office Action" below). Claims 1, 2, 4 and 6-15 are pending in the Application. Claims 1 and 12-14 have been amended above to correct a typographical error. The above amendments do not narrow the scope of the claims. In light of the following remarks, reconsideration and allowance of the application is respectfully requested.

Turning to the rejections presented in the Office Action, the Examiner maintains the rejections presented in the prior Office Action of October 1, 2003. Thus, Claims 1, 2, 4, 6, 7 and 12-15 were rejected under 35 U.S.C. §102(a) as anticipated by "The IntelliMedia WorkBench A Generic Environment For Multimodal Systems", by Brondsted et al. (Office Action ¶3) Claims 8-10 were rejected under 35 U.S.C. §103(a) as unpatentable over Brondsted in view of "Toward Natural Gesture/Speech HCI: A Case Study Of Weather Narration" by Poddar et al. (Office Action ¶4) Claim 11 was acknowledged in the Office Action as including allowable subject matter. (Office Action ¶5)

In addition, in paragraph 6 of the Office Action, the Examiner responds to a number of distinguishing arguments presented in the prior Reply mailed December 15, 2003.

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It is maintained that the remarks given in the prior Reply distinguish the claims from the applied art. Applicants hereby incorporate all of those distinguishing remarks in this response, but for the convenience of the Examiner, Applicants will not repeat them here in detail. Instead, the focus will be placed on the most important and evident shortcomings given in the final Office Action and, in particular, the Examiner's Response to Arguments given in paragraph 6 of the Office Action.

In paragraph 6 of the Office Action the Examiner again points to Sections 2.1-2.2 of Brondsted for purportedly describing a multimodal system that "receives input from both speech and/or gesture simultaneously" and that, "in addition to a pointing gesture, the user can issue spoken commands of key words (additional external information) to the speech recognition system". Paragraph 6 of the Office Action thus concludes that Brondsted describes "receiving additional external information that characterizes at least one machine-sensible feature of a target", as recited in Claim 1.

However, the Office Action fails to show how the speech input of Brondsted describes additional external information "that characterizes at least one machine-sensible feature". The speech inputs described for Brondsted's Campus Information System (Section 2.1) are phrases such as "Show me Hanne's Office". According to

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Section 3 of Brondsted, a nondescript information database or "domain model" is used that simply associates names (among other inputs) with locations (among other outputs). For Brondsted's Automatic Pool Trainer, the speech inputs are described in Sections 2.2 and 3 as being "commands" to the system.

Thus, there is nothing in these sections of Brondsted that teaches additional external information "that characterizes at least one machine-sensible feature of a target", as recited in Claim 1. Without limiting the scope of the claim, particular examples as given in the present Application that correspond to this recitation include receipt of "voice input [that] can comprise one or a number of terms that describe the targeted object, such as the generic name of the object (a barrel), the color of the object (orange or transparent)...that the system is capable of identifying through its sensors". (Specification, pages 7-8)

Because Brondsted only shows speech input that is used in an informational database to generate a corresponding output, Brondsted fails to describe (at least) the Claim 1 recitation of "receiving additional external information that characterizes at least one machine-sensible feature of a target". Independent Claim 13 includes recitations that provide at least analogous distinctions from Brondsted. Similarly, Brondsted fails to teach at least the independent Claim 12 recitations of "scanning an area

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within the range of at least one sensor; identifying potential targets; storing information concerning machine sensible characteristics and locations of said possible targets", as well as "aiming a camera in response to said sensing, storing and said receiving steps".

As to independent Claim 14, there is of course no "machine-sensible" recitation. Applicants' prior arguments distinguishing Brondsted thus focused on the recitation "orienting an instrument with respect to said target to acquire said target in response to said spatial information and said further information to reduce an ambiguity in said position". In response to Applicants' prior arguments, paragraph 6 of the Office Action asserts that "Brondsted describes simultaneous inputs of speech and/or gesture to reduce the ambiguity when acquiring a target". However, as detailed above, Brondsted shows speech input that is only used in a "domain model" to generate a corresponding output. There is nothing in Brondsted that teaches using further information to reduce an ambiguity in the position of a target, as recited in Claim 14.

For at least the above-noted reason, independent Claims 1 and 12-14 are not anticipated by Brondsted. Reconsideration and allowance is respectfully requested. As also noted above, dependent Claims 2, 4, 6-10 and 15 were also rejected as either anticipated by Brondsted, or as obvious over Brondsted in view of

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Podder.¹ Without conceding the patentability per se of the dependent claims, they are allowable at least by virtue of their dependency on their respective independent claim.

The acknowledgement given in the Office Action that Claim 11 includes allowable subject matter is gratefully accepted. However, in view of the above remarks, it is submitted that all of the pending claims in the Application, namely Claims 1, 2, 4 and 6-15, are in shape for allowance. Accordingly, allowance is respectfully requested. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicant's attorney at the number given below.

Respectfully submitted,

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¹It appears from the remarks given in paragraph 6 of the Office Action that the Examiner may have misinterpreted Applicants' prior remarks regarding Podder given in the 12/15/03 Reply. It was previously noted that Poddar fundamentally teaches the use of particular keywords that typically occur with certain gestures to more accurately identify gestures in themselves. Thus, Poddar does not include teachings that cure the deficiencies of Brondsted described above with respect to independent Claim 1.